

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TX
FILED

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UNITED STATES OF AMERICA

v.

CAROL DENNIS

Criminal No.

INFORMATION **3-14 CR-273-P**

The United States Attorney charges:

Count One
Conspiracy to Commit Wire Fraud
(Violation of 18 U.S.C. § 371)

The Conspiracy

1. Beginning in or about December 2008, and continuing through in or about March 2013, in the Dallas Division of the Northern District of Texas, and elsewhere, defendant, **Carol Dennis**, knowingly and intentionally combined, conspired, confederated, and agreed with other persons known and unknown to commit wire fraud, in violation of 18 U.S.C. § 1343, by transmitting in interstate commerce, by means of wire or radio communications, certain writings, signs, signals, and sounds, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud and to obtain money and property from various factoring lending companies, including ARF and RF, by means of materially false and fraudulent pretenses, representations, and promises.

Manner and Means of the Conspiracy and Scheme and Artifice to Defraud

2. It was part of this conspiracy and joint scheme and artifice to defraud that the defendant and her co-conspirators owned and operated WBS, a temporary staffing company, between the years 2008 – 2013.

3. It was further part of the conspiracy and joint scheme and artifice to defraud that the defendant and her co-conspirators entered into agreements with factoring lending companies to assist in financing WBS's payroll.

4. It was further part of the conspiracy and joint scheme and artifice to defraud that the defendant and her co-conspirators submitted approximately \$19 million in false and fraudulent invoices to the factoring lending companies. The proceeds from these false and fraudulent invoices were then used for the personal gain of the defendant and co-conspirators.

Overt Acts in Furtherance of the Conspiracy

5. In furtherance of the conspiracy and to achieve the objects thereof, the defendant, and other persons known and unknown, committed and caused to be committed the following acts, among others, in the Dallas Division of the Northern District of Texas, and elsewhere:

- a. In or about December 2008, **Carol Dennis**, and others, applied for DBA's through the Tarrant County Clerk's office using abbreviated versions for various legitimate companies that WBS had as clients;
- b. In or about December 2008, **Carol Dennis**, and others, opened bank accounts in the name of the newly formed DBA;
- c. Beginning in or about December 2008, WBS began submitting fraudulent work invoices to the factoring lender under the name of

these newly formed DBAs, causing over \$18 million to be wired transferred to the newly formed accounts controlled by co-conspirators;

- d. In or about October 2012, **Carol Dennis** created AAS, which was described as a temporary staffing company; and
- e. Beginning in or about October 2012, **Carol Dennis** submitted fraudulent work invoices from businesses the lender believed to be legitimate, causing approximately \$500,000 to be wired transferred to the DBA bank accounts controlled by co-conspirators.

All in violation of 18 U.S.C. § 371.

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